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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FRANCES E. SWARTZ.

) Case No: 2:15-cv-01811-JAD-PAL

Plaintiff

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) **JOINT STIPULATION FOR EXTENSION
OF TIME TO FILE DEFENDANT'S
CROSS-MOTION TO AFFIRM**

CAROLYN W. COLVIN, Acting
Commissioner of Social Security,

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Defendant

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1 Plaintiff Frances E. Swartz (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
3 to an extension of time to file Defendant's Cross-Motion To Affirm by thirty-two days from May
4 26, 2016 to June 27, 2016, with all other dates in this Court's Scheduling Order extended
5 accordingly. This is the Commissioner's first request for an extension.¹

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16 There is good cause because, since Plaintiff filed her Motion For Reversal And Remand,
17 the Commissioner's counsel has been handling a large number of District Court and Ninth
18 Circuit cases in addition to this one, with eleven briefs—one in the Ninth Circuit—due within the
19 next thirty days. Additionally, counsel has been had numerous other deadlines, including a
20 motion to compel in a discovery dispute, a settlement memorandum in an employment case, and
21 multiple mentoring and reviewing duties in the Office of the General Counsel. As result, the

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¹ This Court granted the Commissioner an extension of time prior to answering Plaintiff's
25 Complaint For Judicial Review because the Social Security Administration component
responsible for producing the certified administrative record had not yet provided it to counsel.
26 That extension occurred prior to briefing.

1 Commissioner needs additional time to properly respond to the issues Plaintiff raised in her
2 motion. Plaintiff has no objection.

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4 Date: May 26, 2016 By: /s/* Richard E. Donaldson
5 RICHARD E. DONALDSON
6 *by email authorization on 5/26/16
7

Attorney for Plaintiff

8 Date: May 26, 2016 DANIEL G. BOGDEN
9 United States Attorney
10 BLAINE T. WELSH
Chief, Civil Division
11 By: /s/ April A. Alongi
12 APRIL A. ALONGI
Special Assistant United States Attorney
13 Attorneys for Defendant
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IT IS SO ORDERED.

22 DATE: May 31, 2016


23 THE HONORABLE PEGGY A. LEEN
United States Magistrate Judge
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1 **DEFENDANT'S CERTIFICATE OF SERVICE**
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4 I certify that I caused a copy of the Joint Stipulation For Extension Of Time To File Defendant's
5 Cross-Motion To Affirm to be served, via CM/ECF notification, on:

6 RICHARD E. DONALDSON
7 Esquire
8 gunlawyer@aol.com

9 Date: May 26, 2016

10 DANIEL G. BOGDEN
11 United States Attorney
12 BLAINE T. WELSH
13 Chief, Civil Division

14 By: /s/ April A. Alongi
15 APRIL A. ALONGI
16 Special Assistant United States Attorney

17 Attorneys for Defendant